

application of an example of the reticulation process. This process demonstrates the significant physical change brought about by the process of reticulation.

Nowhere is reticulated viscoelastic foam mentioned or taught in Landvik. The only mention of reticulation in Landvik is with respect to conventional polyurethane foam. This reference in Landvik actually teaches away from reticulated viscoelastic foam, because, for example, thin layers of reticulated polyurethane foam are attached to each side of a conventional viscoelastic foam for air permeability. (Landvik, col. 3, lines 6-11). Clearly, the problem of lack of air permeability with viscoelastic foam is acknowledged in Landvik. Therefore, Landvik is an example of the prior art problem with respect to a lack of breathability of viscoelastic foam. Landvik explicitly teaches away from the present invention.

Also, although not necessary in view of the foregoing arguments, Applicant notes that Examiner has rejected claims 2 and 3 on the identical basis. In the application, "layers" are explicitly distinguished from "zones" on at least page 13 and accompanying drawings. Landvik discloses only layers and not zones. Applicant submits that the Examiner cannot reject both claims on the basis of the same reference to Landvik. The Landvik components (5,6,7) cannot by definition be layers and zones.

For any one or more of the foregoing reasons, Applicant submits that the present application is in condition for allowance. Favorable action is requested hereon.